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10/16/2000 03 22 PM

To Cindy Colgate/R10/USEPA/US, Loren McPhillips/R10/USEPA/US

cc

Subject FW Comments on Lower Duwamish Waterway RI/FS Statement of Work, June 2000

State Trustee comments below

> -----Original Message-----

> From Wilcox, Michelle

> Sent Monday, October 16, 2000 3.13 PM

> To Huey, Rick

> Cc Adolphson, Peter; Lauri Vigue (E-mail)

> Subject Comments on Lower Duwamish Waterway RI/FS Statement of Work,
> June 2000

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>

> Rick - I am providing some minor comments as part of the public comment

> period, more as clarifiers than substantive comments As you know, I

> submitted the majority of my comments on the draft SOW earlier Michelle

> Administrative Order on Consent Comments

> Regarding the AOC, I am not qualified to provide any substantive comments.

> However, I do wonder how listing the site on the NPL will affect the

> wording and the procedures laid out in the AOC For example, will the

> "off-ramp" option to the City and Boeing be affected? And if so, how?

> Also, specifically, the language in section V, 3 should be changed from

> "The Site and may be proposed " to "The Site and is being

> proposed "

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> Statement of Work Comments

> Again, I am only providing general comments this time around, as you have

> already received specific comments on the earlier version of this

> document However, I would like to take this opportunity to emphasize

> again how important it is for the remedial agencies and the Trustees to

> communicate and coordinate throughout this process for a variety of

> reasons For example, the exposure assessment (Task 3, Scoping-phase

> HHRA, 1st para) that is used and the levels of residual risk (Table 1,

> bullet #9) deemed acceptable to the remedial agencies and the Trustees may

> be different. The more that the remedial actions do to restore the

> natural resources back to their pre-contaminated condition, the less will

> be required of the responsible parties to resolve their Natural Resource

> Damages liability Ideally, the two could be resolved in one consent

> decree.

>

> Also, a few clarifiers/questions

> 1. Task 3, Scoping-phase EcoRA, 2nd para. - Are only chemical criteria

> and benthic tissue effects information being used to determine effects on

> the benthic community, and biological testing data is not being included?

> Please explain

> 2. Task 3, Prioritization Methodology, last sentence - Strike "make"

> and replace with "may"

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> 3 Task 11, first para. - Replace "is" to "in" to read, " as
> characteristics of sediments in unremediated areas, .."
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>



- att1.htm

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